

From: Neil Jones [REDACTED]
Sent: 27 March 2023 13:01
To: localplan@york.gov.uk
Cc: Bartle, Laura
Subject: Draft Local Plan MM Consultation - Representations by Rapleys obo British Sugar
Attachments: Letter to Strategic Planning Policy NJ 27.03.2023_ - signed.pdf

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Dear Sir / Madam
Please find enclosed our representations obo British Sugar.
I will be grateful if you can confirm receipt.

Regards

Neil Jones

BA (Hons) DipTP MRTPI AssocRICS
Consultant - Town Planning
Planning

IMPORTANT: From 1st April 2023 Energy Performance Certificate (EPC) legislation changes significantly for non-domestic properties. Follow [this link](#) for more information

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From: Winter, Emma [REDACTED]
Sent: 27 March 2023 12:38
To: localplan@york.gov.uk
Cc: Richard Crosthwaite (L&Q Estates)
Subject: Draft Local Plan MM Consultation - L & Q Estates Representations
Attachments: L & Q Estates Response to Draft York City Council Local Plan Proposed Main Modifications 270323.PDF

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Dear Sir/Madam
We write to make representations to the York City Council Local Plan Main Modifications on behalf of our client L & Q Estates.
Please find attached a letter setting out L & Q Estates representations.
Kind Regards
Emma

Classification L2 - Business Data

EmmaWinterMRTPI
Associate Partner

Carter Jonas

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Introduction of
BNG to Local Plans in England
Spring 2023 Update
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T: [REDACTED]

Your ref:
Our ref: J0015918

By E-mail: localplan@york.gov.uk

27 March 2023

Dear Sir/Madam,

DRAFT YORK CITY COUNCIL LOCAL PLAN: PROPOSED MAIN MODIFICATIONS CONSULTATION

Carter Jonas LLP has been instructed by our client, L & Q Estates to make representations to the York City Council Local Plan Main Modifications on their behalf.

You will be aware that we have made representations at several stages of the Local Plan process on behalf of our client and also took an active role in several of the hearing sessions at the Examination in Public.

These representations relate to MM2.1, MM3.1, MM3.4, MM3.5. These relate to:

- MM2.1 - Paragraph 2.5
- MM3.1- Policy SS1: Delivering Sustainable Growth for York
- MM3.4 Table 1a and 1b (housing supply and distribution)
- MM3.5 Policy SS1 Explanation – paragraph 3.3

They set out the areas we continue to consider need amending in order to ensure that these policies accord with the tests of 'soundness' set out at paragraph 182 of the NPPF. Given the overlapping issues between these modifications we provide overarching comments below, which apply to each of the proposed main modifications listed above.

Comments in relation to MM2.1, MM3.1, MM3.4, MM3.5

We object to the housing requirement being set at 882 dwellings over the plan period to 2032/33. We continue to stand by the points raised in our earlier representations, which provide evidence that to boost significantly

the supply of housing as required by paragraph 47 of the NPPF, a minimum housing requirement in the region of 1,069 dpa should be introduced in York through this Local Plan. In this regard, we consider that the points raised in the Turley OAN Critique report previously submitted as part of representations to the Proposed Modifications (June 2019) remain highly relevant.


We also object to the amendments proposed on the grounds that there is insufficient land identified for development to meet a further, minimum, period of 5 years to 2038. As highlighted within our previous representations, we consider that Policy SS1 is not sound because it is not positively prepared, effective or consistent with national policy for the reasons set out within our representations to the Pre-Publication Draft (Regulation 18) and Main Modifications (Regulation 19) consultations in July 2019; and, the City of York Local Plan Proposed Modifications and Evidence Base Consultation (Regulation 19) in July 2021. Additional land in demonstrably sustainable locations within the outer ring road of York should be identified for release from the Green Belt to ensure that York has a deliverable supply of land to meet future housing needs. The lack of flexibility within the Local Plan will result in the need for Green Belt boundaries to be altered at the end of the development plan period, which is contrary to paragraph 85 of the NPPF.

We consider that a broader range of sites to respond fully to the range of housing needs, including affordable housing and a range of family housing within sustainable locations should be chosen to ensure that delivery can be both achieved and sustained over the plan period. There remains an over reliance on large strategic sites that are complex and require significant upfront infrastructure, investment and resource; add risk to the delivery of housing in the early period of the plan; and, in the case of the proposed location of the new garden villages are unsustainable.

Conclusions

We trust these representations will be taken into account moving forwards. Please let me know if you require any further information or have any queries.

Yours Sincerely



Emma Winter MRTPI
Associate Partner

E: 
T: 
M: 